

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 3:15-cr-82-CWR-FKB

DANIEL KRAUSE

**MOTION TO MOVE DEFENDANT FROM**  
**MADISON COUNTY DETENTION CENTER**  
**TO GRENADA COUNTY JAIL**

COMES NOW the defendant, Daniel Krause, and respectfully moves this court to order the United States Marshals to move him from the Madison County Detention Center to the Grenada County Jail and house him there until his case is completed. The defendant makes this motion based upon the following reasons:

1.

The defendant, Daniel Krause, is charged in a three-count indictment with violating 18 U.S.C. § 1343, Wire Fraud.

2.

The Office of the Federal Public Defender was court appointed to represent the defendant, Daniel Krause, on this indictment at his arraignment on October 20, 2015.

3.

The defendant, Daniel Krause, has been housed at the Madison County Detention Center since at least the date of his arraignment. Prior to appearing in this Court on a Writ of Habeas Corpus Ad Prosequendum, the defendant was in the Custody of the Mississippi Department of Corrections housed at East Mississippi Correctional Facility. During the defendant's change of plea hearing on December 1, 2015, while responding to the Court's questions, the defendant told the

Court that he was not receiving all his medication at the Madison County Detention Center. The defendant advised the Court, and maintains, that he is not receiving Klonopin which he was prescribed while in the custody of the State of Mississippi to help him sleep. The defendant maintains he needs this medication.

4.

The defendant's sentencing has been continued based on other reasons. Currently there is no set date for sentencing.

WHEREFORE PREMISES CONSIDERED, the defendant respectfully requests that his MOTION TO BE MOVED FROM THE MADISON COUNTY DETENTION CENTER TO THE GRENADA COUNTY JAIL be granted and the order forwarded to the United States Marshal Service.

Respectfully submitted this the 2nd day of August, 2016.

DANIEL KRAUSE, DEFENDANT

By: Dennis Joiner  
Federal Public Defender

/s/Abby W. Brumley  
Abby W. Brumley, MB#101929  
Assistant Federal Public Defender  
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*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I, Abby W. Brumley, do hereby certify that on the 2nd day of August, 2016, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to Jerry Rushing, Esq., Assistant United States Attorney.

/s/Abby W. Brumely  
Abby W. Brumley  
*Assistant Federal Public Defender*